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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

**Freddie Louis Taylor
Ametria Domanise Taylor
Debtor**

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**CASE NO. 22-43018-ELM-13
CHAPTER 13**

**MOTION TO IMPOSE AUTOMATIC STAY AFTER TWO PRIOR DISMISSALS
WITHIN YEAR OF FILING**

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW Debtor, **Freddie Louis Taylor and Ametria Domanise Taylor**, pursuant to 11 U.S.C. §362(c)(3)(B), requesting an order continuing the automatic stay provided under 11 U.S.C. §362(a) as to all creditors. In support of this motion, Debtor states as follows:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105(a), 28 U.S.C. §157(b)(1), and 28 U.S.C. §1334. This matter constitutes a core proceeding as defined by 28 U.S.C. §157(b)(2).
2. Debtor filed the current petition for relief under Chapter 13 on December 9, 2022.
3. Within the twelve months prior to said filing date, Debtor was in an active Chapter 13 case, number 21-31525. Said case dismissed on July 14, 2022, insufficient plan and under the pending dismissal the debtors were also delinquent to the Trustee for plan payments

specified in Debtor's plan. Debtors' car creditors Title Max, did not timely file a proof of claim, including previous associate attorney of Debtors counsel failed to timely file within the required thirty (30) days. The dismissal of the previous case was not entirely the debtors' fault.

4. Debtor had one other case pending within the twelve-month period prior to December 9, 2022. Case number 22-31247 was filed on **July 15, 2022**, and dismissed on **December 7, 2022**, due to the debtor was delinquent in their Trustee payments and could not get current. Debtor also had identity theft that caused IRS liability. Debtor is now working on their tax returns and will resolve the issue with the IRS.
5. Debtor will fully perform the terms of a confirmed plan in the pending case.
6. This motion is not made for the purposes of delay.

WHEREFORE, PREMISES CONSIDERED, Debtor **Freddie Louis Taylor and Ametria Domanise Taylor** respectfully requests the Court continue the stay under 11 U.S.C. §362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2), or a motion for relief from stay is granted under §362(d).

Dated: December 16, 2022

Respectfully Submitted,

LEE LAW FIRM, PLLC

By: /s/Christopher M Lee

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 16, 2022, a true and correct copy of the foregoing was served on all parties in interest below and on the attached mailing matrix.

DEBTOR:

Freddie Louis Taylor
14553 Gorge Dr.
Dallas, TX 75253

STANDING CHAPTER 13 TRUSTEE:

Tim Truman
6851 N.E. Loop 820, Suite 300
North Richland Hills, TX 76180

U.S. TRUSTEE

Rm. 976
1100 Commerce Street
Dallas, TX 75242

By: /s/ Christopher M. Lee
Christopher M. Lee
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